From: Ann Burdett
To: Roberts, Yvette
Subject: Few Questions for you
Date: Tuesday, November 20, 2018 12:37:21 PM

Hi Yvette,

I am working on 2 profiles for one of our facilities.

1. Spent Elemental Mercury (11 lbs total)
    a. We have two PVC pipes (one 4" long and one approx. 8" long with sealed caps on each end) that contain spent elemental mercury. Are you OK with how this was packaged?
    b. Both PVC pipes were placed in one cardboard box and that cardboard box was placed in a DOT approved container with vermiculite (lab packed)
    c. I have profiled it as hazardous waste under RQ, UN2809, Waste Mercury, 8(6.1), PG III (D009). Are you good with this?
    d. I indicated Non-Wastewater with Sub Category >260 mg/kg total mercury (High Mercury-Organic Subcatergory) - Is this subcategory correct?
    e. If this subcategory is correct, then on the LDR it indicates I must complete the F039/UHC Form, do I just list D009 even though I will already list that under the LDR's EPA Waste Code section.
2. Universal Waste – Mercury contained in manufactured articles
    a. We have managed these as UW in Colorado.
    b. I have profiled these as RQ, UN3506, Waste Mercury Contained in Manufactured Articles, 8(6.1) (D009). Are you good with this?
    c. They put all 4 thermostats (with intact Hg bulb inside plastic thermostat box) in a 1.25 gallon DOT approved container with vermiculite. Are you OK with the whole thermostat structure or should the Hg bulbs be removed and placed in container without the plastic housing?

We hope to schedule a pick up for December 5, with a lamp PU also from this location. We will submit new profiles, LDR and a new Service Request once I hear back from you on these questions.

Thanks and Happy Thanksgiving!

Ann Burdett
Interim Environmental Section Supervisor, CHMM

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